

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

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ALEXANDER & SUSAN PROUT  
p/n/f of F.P., a minor  
Plaintiffs,

v.

ST. PAUL'S SCHOOL,  
Defendant.

Case No. 1:16-CV-00225-PB

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**ASSENTED-TO MOTION TO ENLARGE PLAINTIFFS'  
DEADLINE FOR EXPERT DISCLOSURES**

Plaintiffs Alexander and Susan Prout, as parents, next friends, and legal guardians of their minor daughter F.P., by and through their undersigned counsel, hereby respectfully move the Court to enlarge their deadline for expert disclosures consistent with the parties' joint request for a pretrial conference to discuss modifying the scheduling order. In support of this Motion, Plaintiffs state as follows:

1. Both parties have agreed that current pretrial scheduling order and trial notice ("scheduling order") will require certain modifications for various reasons outlined in the parties' respective filings. *See* ECF 27, 28 and 30.
2. The current deadline for Plaintiffs' expert disclosures is September 1, 2017.
3. Because fact witness depositions have not yet taken place, Plaintiffs are not in a position to designate experts and/or to issue expert reports.

4. Accordingly, Plaintiffs respectfully request that the deadline for their expert disclosures be enlarged to a later date to be determined at the jointly requested pretrial conference. *See* attached Civil Form 3.

5. Defendant assents to the relief requested herein.

Respectfully submitted,

/s/ Charles G. Douglas, III

Charles G. Douglas, III (NH Bar. No. 669)

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**CERTIFICATE OF SERVICE**

I certify that, on August 30, 2017, I served the foregoing via the Court's ECF electronic transmission in accordance with the Court's Administrative Procedures for ECF to the registered participants identified on the Notice of Electronic Filing, and paper copies will be sent to those indicated as non-registered participants, if any.

/s/ Charles G. Douglas, III

Charles G. Douglas, III (NH Bar. No. 669)